

Arnold & Porter

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November 4, 2021

VIA ECF

The Honorable P. Kevin Castel

Re: *Ragbir, et al. v. Johnson, et al.*, 18-cv-1159 (PKC)

Dear Judge Castel:

Counsel for Plaintiffs and Defendants ("the Parties") respectfully write to submit this joint request for the Court to adjourn all deadlines and hearings and to hold this action in abeyance. On September 22, 2021, the Court granted the Parties' proposed briefing schedule, under which Defendants' motion to dismiss is currently due on November 8, 2021. ECF No. 129. On October 6, 2021, this Court provisionally scheduled an evidentiary hearing for November 15, 2021, to address potential factual disputes related to the issue of mootness, ECF No. 131, and subsequently rescheduled that hearing to November 16, 2021. Yesterday, however, the Parties reached an agreement in principle to resolve the entire action without further litigation. In order to allow the Parties time to memorialize the agreed-upon settlement terms in a written stipulation and order of dismissal, the Parties jointly request that this Court adjourn *sine die* the evidentiary hearing and all briefing deadlines, and hold this action in abeyance for 45 days, until December 20, 2021.

Because the Parties have reached an agreement that would resolve the entire case, the Parties respectfully submit that it would be prudent to hold this action in abeyance, while adjourning the hearing and all deadlines, to permit the parties time to reduce that agreement to writing. The Parties submit that an abeyance will advance the interests of the Parties and the Court by facilitating the anticipated resolution of this case in lieu of further litigation, and avoid the unnecessary expenditure of additional judicial and party resources.

We thank the Court for its consideration of this request.

The November 16, 2021
hearing is VACATED.
All deadlines are
extended by
45 days. Either motion
(Doc 132) should be terminated.
SO ORDERED
JSDJ
11-9-21

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Respectfully Submitted,

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